

INDEPENDENT
TELEPHONE & TELECOMMUNICATIONS
ALLIANCE

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 15, 1997

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

HAND DELIVERED

Re: Universal Service Rural Task Force Nomination
Public Notice FCC 97J-1
CC Docket No. 96-45

Dear Mr. Caton:

Pursuant to Public Notice FCC 97J-1 released in the above-referenced docket¹ the Independent Telephone and Telecommunications Alliance (ITTA) hereby nominates the following persons to serve as Category 1 representatives (under \$40 million in annual operating revenues) to the Universal Service Rural Task Force (RTF): Dwayne Dowtin, Director, Federal Regulatory Affairs of Citizens Communications and its operating companies and Donn T. Wonnell, Vice President, Regulatory Affairs & Secretary of Pacific Telecommunications, Inc. and its PTI Communications operating companies.

ITTA is an alliance of 15 midsize incumbent local exchange carriers (ILECs) formed in 1994 to give midsize carriers a greater voice in telecommunications policymaking. ITTA member companies currently operate in 41 states and serve over 7 million customers across the country. Midsize companies are among the leading providers of telecommunications services to rural America. ITTA is the only organization whose sole mission is to represent midsize carriers' interests.

Donn Wonnell and Dwayne Dowtin are highly qualified to represent the smaller ILEC perspective on the RTF. Both of their holding companies, PTI and Citizens respectively, own one or more operating companies in a number of states, each of which has annual

¹ FCC Public Notice 97J-1, "Federal-State Joint Board on Universal Service Announces the Creation of a Rural Task Force; Solicits Nominations for Membership on Rural Task Force," released September 17, 1997 (RTF Public Notice).

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revenues of \$40 million or less which qualifies them to serve as smaller ILEC representatives. Both nominees have played key policymaking roles for their individual operating companies as well as for their multi-state holding companies. Both Citizens Communications and PTI Communications offer a wide range of telecommunications services principally to rural customers.

Mr. Dowtin and Mr. Wonnell are knowledgeable about the economic, technical and policy concerns of rural local exchange providers. The two nominees have already played an active role in developing the universal service rules that the Joint Board has recommended and the Commission has promulgated to date. Their leadership within their companies and in the telecommunications community at large has exposed them to the broad range of rural policy issues that must be addressed by the RTF as it deliberates the appropriateness of proxy cost models for rural carriers. Further biographic information on both nominees is attached hereto.

It is vital that the RTF include representation from midsize rural ILECs if it is to include the "broad industry representation" stipulated by the Universal Service Report and Order² and the RTF Public Notice.³ Midsize carriers offer a unique perspective on the financial, technical and policy challenges involved in serving rural customers and would add materially to the breadth of perspective on the RTF. The RTF Public Notice also states that RTF membership be "well-balanced."⁴ To achieve the required balance among the RTF's industry representatives, the Joint Board should ensure representation for each of the three segments of the ILEC industry identified by the Telecommunications Act of 1996 – small ("rural"), midsize (serving less than 2% of the nation's access lines) and large companies. Selection of Mr. Wonnell and Mr. Dowtin would ensure that the millions of rural customers served by midsize companies would have a voice in the RTF's deliberations.

The RTF Public Notice also stipulated as a qualification for nominees that they "should have sufficient resources to devote to the project..."⁵ As representatives of their larger holding companies as well as their smaller individual operating companies, both Mr. Dowtin and Mr. Wonnell would naturally bring to bear the resources of their respective holding companies in support of the RTF's work. These resources would help to advance materially the work of the RTF and increase the value of its final report to the Joint Board in the coming year.

² Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, 62 Fed. Reg. 32862 (rel. May 8, 1997) at ¶ 253.

³ RTF Public Notice at 1.

⁴ *Ibid.*

⁵ *Ibid.* at 1-2.

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In conclusion, ITTA urges the members of the Joint Board to select Donn Wonnell and Dwayne Dowtin as Category 1 (under \$40 million) representatives to the RTF. Because of their knowledge, prior experience, resources and unique midsize perspective, they would contribute substantially to the balance and effectiveness of the RTF and the quality and reliability of its final report to the Joint Board.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Zesiger". The signature is fluid and cursive, with the first name "David" being the most prominent.

David W. Zesiger
Executive Director

enclosures

Donn T. Wonnell
Vice President, Regulatory Affairs
& Secretary



805 Broadway
Post Office Box 9901
Vancouver, Washington
98668-8701

360 905-7372

Donn T. Wonnell is Vice President, Regulatory Affairs & Secretary for Pacific Telecom, Inc., in Vancouver, Washington, where he directs the company's legal, regulatory, and legislative affairs. PTI is the seventh largest independent telephone and telecommunications company in the country, with gross revenues in 1996 of \$600 million. Pacific Telecom serves approximately 600,000 access lines in eleven states, which are predominantly rural in character, and also provides cellular telephone service throughout the upper Midwest.

Mr. Wonnell has worked in the telecommunications industry for twenty years. He served as Chairman of USTA's Mid-Size Company Committee (1995-1996) and currently represents PTI in the Independent Telephone & Telecommunications Alliance. Mr. Wonnell has appeared before the U.S. Senate Commerce Committee and the Federal-State Joint Board (CC Docket No. 96-45) to testify on matters relating to rural telecommunications service. Prior to joining PTI, he served as President of the Telecommunications & Energy Division of CP National Corporation in San Francisco, California, and, earlier, as Vice President & General Counsel of RCA Alaska Communications in Anchorage, Alaska. He is a graduate of the College of William and Mary in Virginia (BA) and of the University of Pennsylvania School of Law (JD). He has been admitted to practice before the bars of Alaska, California, Pennsylvania, and the District of Columbia.

Dwayne Dowtin
Citizens Communications
Suite 500, 1400 16th St. N.W.
Washington, D.C. 20036

QUALIFICATIONS

Over 15 years experience in Telecommunications, Broadcasting/Radio, background in regulatory affairs and local exchange carrier relations, specializing in strategic planning/business development, legislative/regulatory tracking and market research. Extensive experience in financial analysis, restructuring and productivity improvement through activity analysis, business process analysis, activity based cost systems and performance measurement.

PROFESSIONAL EXPERIENCE

Regulatory Experience

Director of Federal Regulatory, Citizens Communications, 4/96 -present

- Responsible for the development and integration of regulatory strategy, federal telecommunications legislation and public policies that have impact across the Citizens local exchange subsidiaries.
- Responsible for the analysis of current and anticipated competition in selected jurisdictions and markets; to assess impact on rates for residential and business customers.
- Represents the Telecom Sector before FCC, Congressional members, The United States Telephone Association, as a member of regulatory policy and other committees dedicated to regulatory issues and advocacy.

Adjunct Professor, Communication Law, Bowie State University, Bowie, MD

- Course curriculum includes analysis of Telecommunications Act of 1996, Historical Perspective of Federal Regulations in Broadcasting & Telecommunications; 1/95-Present.

Sr. Telecommunications Policy Analyst, Federal Communications Commission, Office of Communications

Business Opportunity, 1/95-4/96

- Responsible for advising and making recommendations to the Bureau's and the Chairman on all matters affecting business opportunities for small business, minorities and woman in the licensing and regulation of radio, cable TV, broadcast satellite, mobile radio, cellular, PCS, telephone, and other emerging technology offerings.
- Responsible for general economic theory, preparing relevant economic, technological, and regulatory information affecting the Bureaus regulatory policy on the industry.
- Utilization of financial models to analyze investment strategies in connection with wireless & wireline telecommunications offerings, (i.e., PCS infrastructure buildout, merging of wireless .
- Reviewed Commission Agenda items in Circulation on topics including Access, Local Transport, Interconnection, Unbundling the Local Network, FCC's Attribution Rules, Broadcast Ownership.

Financial Management Experience

Sr. Economist, Bell Atlantic 9/92-12/94, Product Profitability Systems

- Responsible for the design, development, and implementation of cost studies which identify direct/indirect cost allocation for product profitability.

- Responsible for analyzing business cases of potential product offerings and developing cost tables for proposal submissions for the Federal Systems Organization.
- Utilization of financial models to analyze product revenue components, and technical cost profiles .

Sr. Financial Analyst, Bell Atlantic 5/88-9/92, Purchasing Department

- Responsible for procurement of \$20.5 million dollar contract base.
- Development of pricing and cost data for RFQs, RFIs, Trial Agreements.
- Performed technical & economic evaluations using the business case financial modeling process for supplier products.
- Developed methods and procedures for identifying all cost incurred by purchasing for the provisioning for new CPE products.

Purchasing Manager, Bell Atlantic 4/87-5/88, Purchasing/Contract Administration

- Responsible for coordinating, directing and performing risk analysis on contract solicitations for AIN products and services.
- Prepare contractual correspondence, interface as liaison for Purchasing with Bell Atlantic's legal counsel.
- Monitor contract deliverables/performance based on FAR/CAS requirements.
- Supervised 12 contract agents, with an operating budget of \$357,000.

Financial Analyst, Bell Atlantic 4/85-4/87, Materials Management.

- Responsible for conducting financial studies relating to all phases of the Transportation Services Organization.
- Coordinated Supplier interface for Common Carrier contracted services.
- Developed long and short range business cases designed to forecast operations strategies, resource allocation, capacity planning, inventory levels, systems integration.

Marketing Management Experience

Marketing Manager, Bell Atlantic 2/84-4/85, Operator Services

- Responsible for the management of the Call Completion Product line.
- Project management of business case proposals, scheduling, organizing and coordinating strategy
- Development for implementation of Calling Card Service.
- Coordinated all supplier interface for product proposal activity.

EDUCATION

George Mason University, Fairfax, VA.

Masters degree in Telecommunications Management, May 1993.

George Washington University, Washington, DC.

Professional Certification in Telecommunications Management, May 1987.

Morgan State University, Baltimore, MD.

MBA degree with a concentration in Marketing Management, May 1985.

Cornell University, Ithaca, NY.

Bachelor of Science, in Economics and Business Management, May 1980.

CERTIFICATE OF SERVICE

I, Elnora Harvey, an employee of the consulting firm of Johnson, Smith, Dover, Kitzmiller & Stewart, hereby certify that a copy of the foregoing has been served via first-class postage pre-paid mail on the following this 15th day of October, 1997:

The Honorable Julia Johnson, State Chair
Chairman
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable David Baker
Commissioner
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30344-5701

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 East Capitol Street
Pierre, SD 57501-5070

The Honorable Martha S. Hogerty
Public Counsel
Missouri Office of Public Counsel
301 West High Street, Suite 250
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Charles Bolle
South Dakota Public Utilities Commission
State Capitol
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Pierre, SD 57501-5070

Bridget Fuff
State Staff Chair
Florida Public Service Commission
2450 Shumard Oak Boulevard
Tallahassee, FL 32399-0866

Phillip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Tiane Sommer
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30344-5701

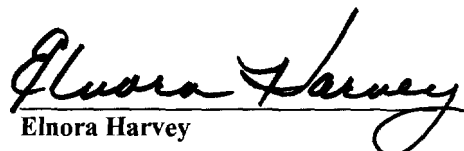
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Texas Public Utility Commission
1701 North Congress Avenue
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Maryland Public Service Commission
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